

1 Stacy Scheff
2 LAW OFFICE OF STACY SCHEFF
P.O. Box 40611, Tucson, AZ 85717-0611
(520) 471-8333 • FAX (520) 300-8033
3 stacy@ScheffLaw.com
State Bar No. 028364
4 *Counsel for Plaintiff*

5
6 **DISTRICT COURT FOR THE UNITED STATES**
7 **DISTRICT OF ARIZONA**

8 6 Keith Raniere,

Case No.: 4:22-cv-00561-RCC-PSOT

9 7 Plaintiff,
v.

10 8 Merrick Garland, *et. al.*
PLAINTIFF'S MOTION FOR
EXTENSION OF TIME TO
RESPOND TO MOTION FOR
SUMMARY JUDGMENT

11 9 Defendants

12 10 Plaintiff, via counsel, requests an extension of 60 days to respond to Defendants'
Motion for Summary Judgment at Doc. 36. The current deadline is today, May 31, 2023.
The extended deadline will be July 31, 2023. The reason for the extension is that Plaintiff
13 received information indicating that Defendant Warden Gutierrez was open to settlement
14 negotiations. The negotiations were unsuccessful.

15 15 Additionally, Plaintiff is asking for leave to conduct limited scope discovery
regarding the facts asserted in Defendants' Motion. If granted, the discovery will require
16 additional time for gathering and responding to the requests before a response can be
17 filed.

18 19 Undersigned reached out to opposing counsel for her position on this requests.
Ms. Faulk has not responded regarding the extension of time.

20 21 //

1 DATED this 31st day of May, 2023 by
2
3

/s/Stacy Scheff
STACY SCHEFF
Attorney for Plaintiff
4

5 Delivered via ECF
6 to all registered parties
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22